

EXHIBIT A

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 1:20-cv-03178 (LJL)

5 - - - - -x

6 HC2, INC., :

:

7 Plaintiff, :

:

8 - vs - :

:

9 ANDREW DELANEY, :

:

10 Defendant. :

11 - - - - -x

12
13 May 19, 2020
14 10:09 a.m.
15 6 N. Pershing Avenue
16 Bethpage, New York 11714
17
18
19

20 VIRTUAL DEPOSITION UPON ORAL
21 EXAMINATION OF STEPHANOS ZANNIKOS, ESQ., held at
22 the above-mentioned time and place, before Randi
23 Friedman, a Registered Professional Reporter,
24 within and for the State of New York.
25

1 S. Zannikos, Esq.

2 A Hire Counsel --

3 MR. ROSSI: Hold on a second,
4 Stephanos. You need to give me a little
5 pause if I want to object. I object to the
6 form of the question.

7 BY MR. ROTMAN:

8 Q Let's go back to what my first
9 question was. Please describe the relationship
10 between Hire Counsel and HC2.

11 MR. ROSSI: Form objection.

12 BY MR. ROTMAN:

13 Q Are they the same company?

14 MR. ROSSI: Form objection. You
15 can answer, Stephanos.

16 THE WITNESS: Okay. Hire Counsel
17 is the -- HC2 is the corporate name, and its
18 d/b/a is Hire Counsel.

19 BY MR. ROTMAN:

20 Q And are there any sister companies?
21 Does HC2 have any sister companies?

22 A It has one sister company called
23 Mestel & Company.

24 Q Now as general counsel for HC2, what
25 are your responsibilities?

1 S. Zannikos, Esq.

2 A To oversee all the legal matters
3 related to HC2.

4 Q Does that include litigation?

5 A Correct.

6 Q Do you supervise any people?

7 A At the moment, no. I have direct
8 reports.

9 Q Direct reports to you?

10 A In the legal department.

11 Q Who else is in the legal department at
12 HC2?

13 A Currently it consists of one attorney,
14 and that would be me.

15 Q Are there any paralegals or any other
16 staff in the legal department at HC2 currently?

17 A No.

18 Q Where is your office located?

19 A It's located in New York.

20 Q At what address?

21 A 360 Lexington Avenue, New York, New
22 York, 10017.

23 Q And you have a full-time office there?

24 A Yes.

25 Q And are you at that office five days a

1 S. Zannikos, Esq.

2 focuses on temporary legal staffing services,
3 where Mestel focuses on permanent legal staffing
4 services.

5 Q Now what is the principal place of
6 business of HC2?

7 A That would be our Chicago office.

8 Q And has this changed in the past two
9 years?

10 MR. ROSSI: Object to the form.

11 MR. ROTMAN: Is that confusing?

12 BY MR. ROTMAN:

13 Q Has the principal place of business
14 changed in the last two years?

15 A It may have changed over the course of
16 time longer than the last two years.

17 Q Did it change in the last year?

18 A No. It's longer than two years.

19 Q Now have you heard of the name Andrew
20 Delaney before March 17th, 2020?

21 A No.

22 Q Now I want to turn your attention to
23 your declaration, which is Exhibit 1 here.

24 A Let me correct my last answer. I may
25 have through various procedures that the company

1 S. Zannikos, Esq.

2 project agreement," starting from there?

3 BY MR. ROTMAN:

4 Q Yes, the last two sentences.

5 A All right. "Pursuant to the project
6 agreement, HC2 would manage the employment
7 administrative aspects of the project and provide
8 workspace for the contract professionals during
9 the project. The law firm customer supervises
10 substantive aspects of the project with HC2
11 assigning day-to-day supervision."

12 Q Now my client, Andrew Delaney, was
13 employed by HC2; isn't that correct?

14 A Correct.

15 Q Now was that employment to work on the
16 project?

17 A He was employed to be assigned to
18 projects.

19 Q But he worked on this project that we
20 just spoke about, Project 17?

21 A He did work on this particular
22 project, yes.

23 Q Did his work entail reviewing
24 documents?

25 A Can you clarify the question? You

1 S. Zannikos, Esq.

2 acting as a document reviewer, yes.

3 BY MR. ROTMAN:

4 Q Now when did he become employed by
5 HC2?

6 A When he had signed the Employment
7 Agreement. I believe it was December 28, 2016.

8 Q Did he receive a paycheck -- you said
9 December 28th, 2016. Do you even know if he
10 received a paycheck in January 2017?

11 MR. ROSSI: Object to the form.

12 MR. ROTMAN: It's a simple
13 question.

14 BY MR. ROTMAN:

15 Q Do you know if he received a paycheck
16 in January of 2017?

17 MR. ROSSI: Object to the form.
18 It's argumentative. You don't need to
19 characterize your questions, whether they're
20 simple or complex.

21 MR. ROTMAN: Please don't lecture
22 me. If you're instructing him not answer
23 the question, instruct him not to answer the
24 question. We'll put it down for a ruling.
25 I think it's a very simple question.

1 S. Zannikos, Esq.

2 Delaney.

3 Do you know when Andrew Delaney was
4 first placed on assignment by Hire Counsel by
5 HC2?

6 A After December 2016.

7 Q Was it September 30th, 2019?

8 A My understanding is that he was placed
9 on an assignment around September 30th, 2019.

10 Q So he signed an agreement on
11 December -- an Employment Agreement on
12 December 28, 2016, and was placed on an
13 assignment on September 30th, 2019; correct?

14 A He was placed in our candidate pool
15 after he had signed the Employment Agreement, but
16 then his first assignment wasn't until
17 September 30th, 2019, after that point.

18 Q Now isn't it correct that Mr. Delaney
19 began working on this project, the project we
20 referred to in Paragraph 17, on September 30th,
21 2019?

22 A Yes.

23 Q Isn't it correct that Mr. Delaney left
24 the project on January 4th, 2020?

25 A I don't know the precise date. I just

1 S. Zannikos, Esq.

2 MR. ROSSI: Your use of the word
3 "hired." It's ambiguous.

4 THE WITNESS: Right; he wasn't
5 hired. He was selected to begin an
6 assignment.

7 BY MR. ROTMAN:

8 Q What does that mean -- who was he
9 selected by?

10 A Hire Counsel had presented candidates
11 from our candidate pool, which Mr. Delaney was
12 one of them to --

13 Q And hired --

14 A The law firm customer. And from those
15 candidates, the law firm customer selected the
16 reviewers that should be assigned.

17 Q So it was the law firm customer that
18 selected Mr. Delaney; correct?

19 A The law firm customer selected
20 candidates that we had submitted to them for
21 consideration.

22 Q So if I understand this correctly, you
23 pre-selected the list which you submitted to the
24 law firm client; correct?

25 A We were tasked with finding attorney

1 S. Zannikos, Esq.

2 document reviewers for a project for the law firm
3 customer. We used our database and we selected
4 candidates who fit the profile that the law firm
5 customer wanted, and we submitted those
6 candidates to the law firm customer for their
7 review, and they selected the ones that they
8 wanted to place -- that they thought should be
9 assigned to the project. And then afterwards, we
10 assigned them.

11 Q But the law firm customer made the
12 final selection; correct?

13 A From the candidates that we submitted
14 to them, yes.

15 Q Now isn't it correct that Delaney was
16 hired to review Thai documents?

17 A He was not hired. He was selected
18 from candidates that we had in our candidate pool
19 and that we submitted to Wilmer.

20 Q And he was selected to review Thai
21 documents?

22 MR. ROSSI: Object to the form.

23 THE WITNESS: As an attorney, yes.

24 BY MR. ROTMAN:

25 Q Now how many agreements did

1 S. Zannikos, Esq.
2 exhibit from what I recall. Other than that,
3 around the time when he was hired in 2016, I
4 believe there was an employee handbook, a Code of
5 Conduct. There may have been additional
6 documents.

7 But my understanding from what you're
8 asking is that if it's just an agreement, and
9 using that in the legal context, the only
10 agreement that Mr. Delaney would have signed at
11 the time of his hire was his Employment
12 Agreement, which was only, including the NDA that
13 was attached as an exhibit, I would say five
14 pages. Five to maybe six pages.

15 Q Now you specifically refer to the HC2
16 agreement.

17 Didn't the HC2 agreement make him
18 subject to other agreements with your clients?

19 MR. ROSSI: Object to the form of
20 the question. Misstates the testimony.

21 THE WITNESS: The HC2 Employment
22 Agreement does incorporate by reference, I
23 believe, the employee handbook and the Code
24 of Conduct.

25

1 S. Zannikos, Esq.

2 BY MR. ROTMAN:

3 Q And any of the policies and any of the
4 other agreements of the law firm customer?

5 MR. ROSSI: Object to the form.

6 THE WITNESS: At the point where
7 he's being hired, the law firm customer --
8 there are no documents associated with the
9 law firm customers.

10 BY MR. ROTMAN:

11 Q But the HC2 Employment Agreement
12 incorporates by reference other agreements; isn't
13 that correct?

14 A Not other agreements. I mean, there's
15 the NDA which could constitute an agreement,
16 which I believe is the two pages. That's
17 attached as an exhibit. The agreement then
18 refers to, I believe, the employee handbook and
19 the Code of Conduct. That, I believe, is the
20 full scope of the agreement.

21 Q And are some of those obligations to
22 other people other than HC2? I'm referring to
23 the obligations of the agreements that you just
24 described.

25 MR. ROSSI: Form objection.

1 S. Zannikos, Esq.

2 The law firm customer.

3 BY MR. ROTMAN:

4 Q HC2 did not suspend the project on
5 that date; isn't that correct?

6 MR. ROSSI: Object to the form.

7 THE WITNESS: The law firm
8 customer suspended the project.

9 BY MR. ROTMAN:

10 Q HC2 did not suspend the project? Let
11 me rephrase.

12 Did HC2 suspend the project on that
13 date?

14 A No.

15 MR. ROSSI: Object to the form.
16 Asked and answered.

17 MR. ROTMAN: Court Reporter, I
18 want to introduce a document as an exhibit.
19 Let me email it to all of you and we can
20 discuss it. Let me just take a moment.

21 MR. ROSSI: Mr. Rotman, why don't
22 we take a break for five minutes. We've
23 been going an hour, unless you're going to
24 finish in the next 10 to 15.

25 MR. ROTMAN: No. I think I need

1 S. Zannikos, Esq.

2 controlled the project; isn't that correct?

3 A That is not correct.

4 Q They made the decision to terminate
5 the project; correct?

6 A I'm sorry. You said law firm
7 customer?

8 Q Yes. If I said -- I'm sorry.

9 MR. ROTMAN: Reporter -- Randi,
10 can you please read that last question? I
11 may have misspoken or maybe -- just so we
12 were correct on this.

13 (Whereupon the reporter read back
14 the requested portion of the record.)

15 BY MR. ROTMAN:

16 Q So the law firm client made the
17 decision to terminate the project; isn't that
18 correct?

19 A No, that's not correct. The project
20 wasn't terminated. It was suspended.

21 Q The law firm client made the decision
22 to suspend the project on that date?

23 A That's my understanding, yes.

24 Q HC2 did not make the decision to
25 terminate -- to suspend the project on that date?

1 S. Zannikos, Esq.

2 A That is correct.

3 Q And before we had gotten into a
4 discussion as to was the project suspended, and
5 you bifurcated your answer when you said, are you
6 talking about the New York project or everywhere
7 else.

8 Has this project been suspended at
9 other locations?

10 A From my understanding, yes.

11 Q Is it fair to conclude that the
12 project is effectively suspended right now?

13 A I don't know what the current status
14 would be, but at some point, the project was
15 suspended in three locations.

16 Q What were those three locations?

17 A One location in New York. One
18 location in Los Angeles. And one location in the
19 United Kingdom.

20 Q Is that location in United Kingdom in
21 London?

22 A Yes.

23 MR. ROTMAN: Court Reporter, I
24 want to introduce another exhibit. We'll
25 just go through that same procedure that we

1 S. Zannikos, Esq.

2 hours.

3 Q Do they work year-round?

4 A Some do. Some don't.

5 Q Let me turn your attention to Page 4
6 of this document. Not Page 4. I mean pdf Page
7 4; not the actual Page 4 of the document.

8 You see it? Where it says, "Welcome
9 to Hire Counsel"?

10 A I see it.

11 Q Okay. That first sentence states that
12 the headquarters at HC2 was in New York; isn't
13 that correct?

14 A The document does state that.

15 MR. ROTMAN: Court Reporter, I
16 want to introduce another exhibit, and we'll
17 follow the procedure as we just did. We'll
18 call this Defendant's 5.

19 (Defendant's Exhibit 5 was
20 identified.)

21 BY MR. ROTMAN:

22 Q Call it the Antonelli complaint.
23 Curran Antonelli complaint.

24 Mr. Zannikos, do you recognize this
25 document?

1 S. Zannikos, Esq.

2 A I do.

3 Q What is this document?

4 A The complaint that the company had
5 filed in the collection action against the law
6 firm, Curran Antonelli.

7 Q I turn your attention to the filing
8 receipt at the top. What date was this action
9 filed?

10 A It was filed on May 24, 2019. It was
11 received then. Let me see when it was filed. I
12 believe that's the file date, May 24, 2019.

13 Q And did you sign -- is that you who
14 signed the summons? Is that your signature on
15 Page 1?

16 A That is my signature, yes.

17 Q And is that your signature on the last
18 page of the complaint?

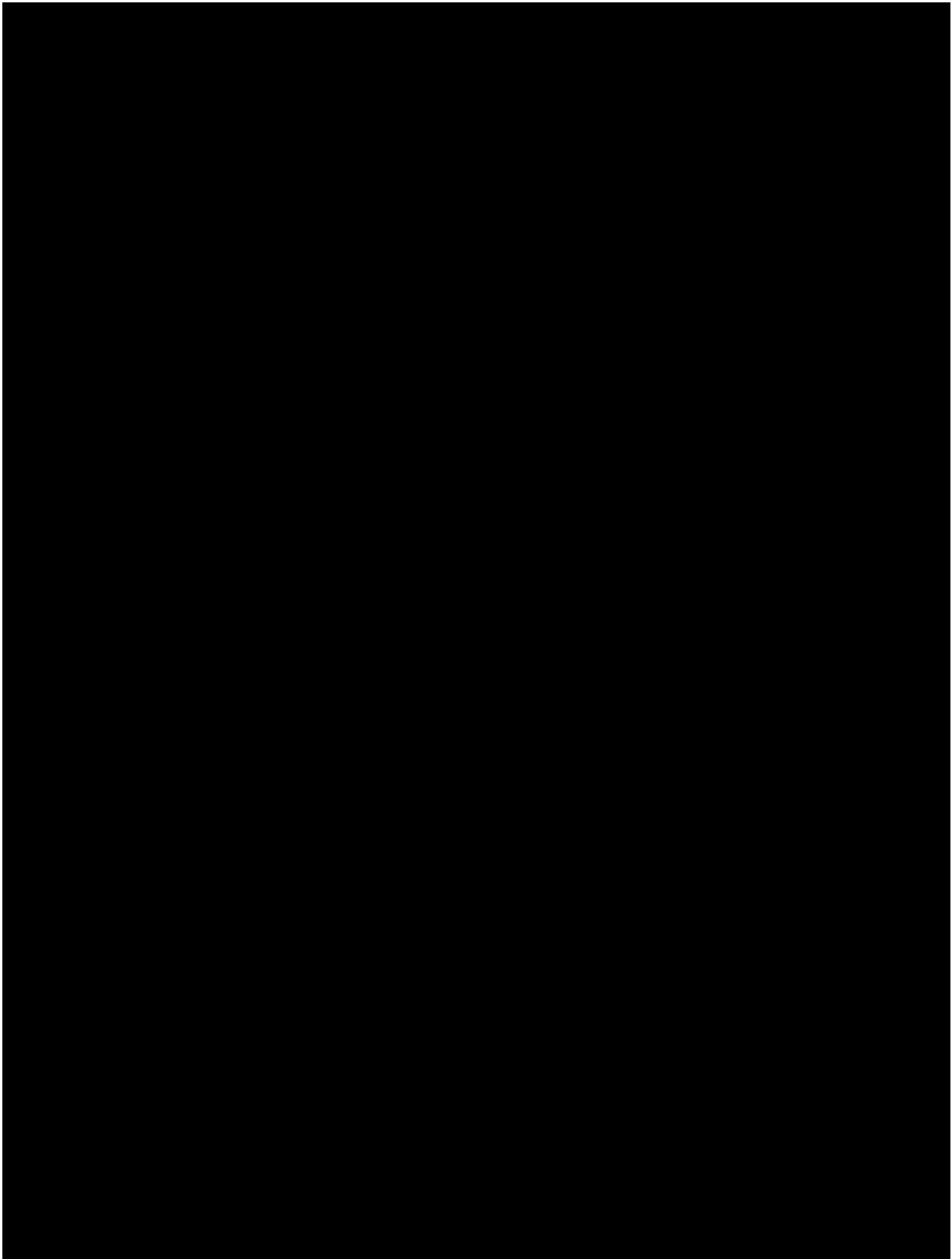
19 A That is my signature, yes.

20 Q Let me turn your attention now to
21 Paragraph 5 of the complaint. Now that paragraph
22 says, "Plaintiff maintains its principal place of
23 business at 360 Lexington Avenue, Suite 1100, New
24 York, New York, 10017"; isn't that correct?

25 A That's correct. That's what the

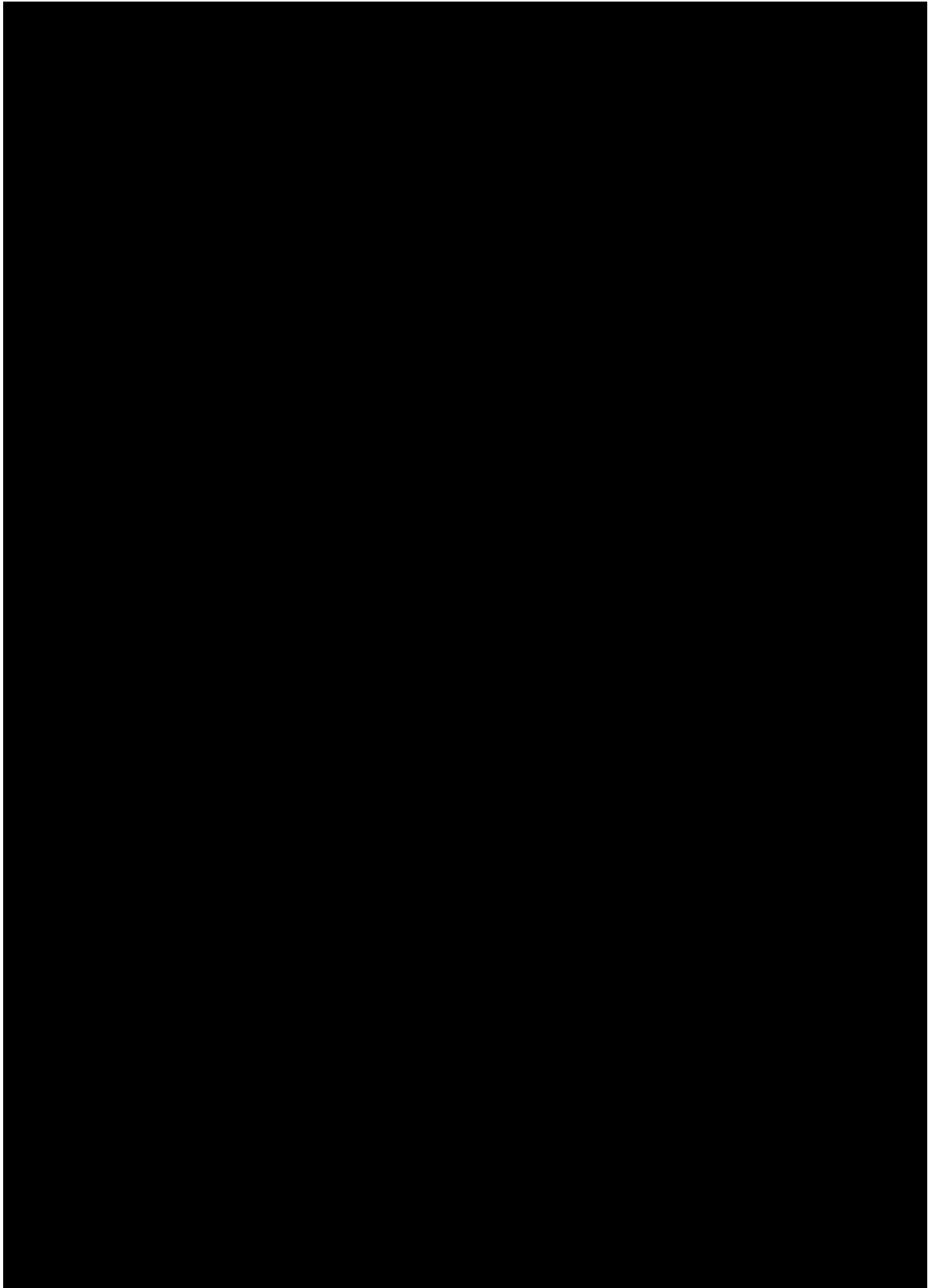
S. Zannikos, Esq.

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S. Zannikos, Esq.

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1 S. Zannikos, Esq.

2 Delaney did not have access to the HC2 premises
3 after that date?

4 A It would be safe to say that there are
5 measures that would prevent him from accessing
6 the space after that time.

7 Q Would it be fair to say that Andrew
8 Delaney did not have access to documents located
9 in the center after that date?

10 A It would be safe to say that. I mean,
11 there are things implemented that would prevent
12 him from reviewing documents on the site after
13 March 17th, 2020.

14 Q Now isn't it correct that Wilmer Hale
15 employees told you that information in the
16 Florida complaint was confidential?

17 MR. ROSSI: I'm sorry. I didn't
18 hear the question. Can I have it read back?

19 MR. ROTMAN: Court Reporter,
20 please repeat the question.

21 MR. ROSSI: Thank you,
22 Ms. Friedman.

23 (Whereupon the reporter read back
24 the requested portion of the record.)

25 THE WITNESS: Wilmer Hale

1 S. Zannikos, Esq.

2 employees did instruct me -- or did inform
3 me that they believed that information was
4 confidential.

5 BY MR. ROTMAN:

6 Q So they informed you of that
7 information?

8 A Well they informed me in a general
9 sense that the information in the complaint was
10 confidential.

11 Q And you relied on that information
12 conveyed for your conclusion --

13 A It was one of the factors.

14 Q -- that the complaint was
15 confidential; isn't that correct?

16 MR. ROSSI: Sorry. You guys are
17 both speaking at the same time. Let him
18 finish his question and then give your
19 answer.

20 MR. ROTMAN: Randi, please restate
21 the question.

22 (Whereupon the reporter read back
23 the requested portion of the record.)

24 THE WITNESS: It was a factor.

25

1 S. Zannikos, Esq.

2 enforced.

3 MR. ROTMAN: No other questions.

4 EXAMINATION

5 BY MR. ROSSI:

6 Q Again, I'm Ron Rossi from Kasowitz
7 Benson for the plaintiff, HC2.

8 Mr. Zannikos, currently the principal
9 place of business of Hire Counsel is Chicago,
10 Illinois; correct?

11 A Correct.

12 Q And that's where the high level
13 officers of Hire Counsel are located and where
14 they direct, control and coordinate HC2's
15 activities?

16 A That's correct.

17 Q That would include the CEO and the
18 CFO, among others?

19 A The interim CFO, correct, and others,
20 correct.

21 Q You had some questions about 320 -- I
22 think if I get the address wrong, please correct
23 me -- an office located in New York at 320
24 Lexington, I think it was?

25 A 360 Lexington.

1 S. Zannikos, Esq.

2 Q 360 Lexington, thank you.

3 And that's an HC2 office space?

4 A That is correct.

5 Q Is that the physical location where
6 Mr. Delaney and others were working on the
7 project?

8 A That is correct.

9 Q And do you recall that March 17, 2020
10 was a Tuesday? I'll represent for the record
11 that it was. I remember it because it's one of
12 the saddest St. Patrick's Day in New York history
13 because the parade was canceled.

14 MR. ROTMAN: That is correct. I
15 will stipulate to that.

16 BY MR. ROSSI:

17 Q Do you recall whether or not the 360
18 Lexington Avenue was closed to all employees at
19 any point in time following March 17, 2020?

20 A It closed after the stay-at-home order
21 was issued the following Friday, I believe.

22 Q So just sequentially, Tuesday, 17
23 March, some time thereafter during that week, the
24 stay-at-home order was issued by Governor Cuomo?

25 A Correct.

1 S. Zannikos, Esq.

2 Q And then by the following Monday, the
3 23rd, all non-essential businesses had to close;
4 correct?

5 A Correct.

6 Q And was the 360 Lexington Avenue
7 closed to all as of 23 March, 2020?

8 A Correct, it was.

9 Q Has it stayed closed since then?

10 A Yes.

11 Q On 17 March, 2020 when the project was
12 suspended, was Mr. Delaney eligible to work on
13 the project if it had been -- if the suspension
14 had been lifted?

15 A Yes.

16 Q And on March 17, 2020, was Mr. -- did
17 Mr. Delaney remain eligible to work on other HC2
18 projects if other of its clients had selected
19 Mr. Delaney for participation?

20 A That is correct. We would have
21 submitted him, too, for consideration.

22 Q So was the only change in his
23 employment status as of March 17, 2020, the fact
24 that the active project that he was working on
25 was no longer active due to the law firm customer

1 S. Zannikos, Esq.

2 suspension of it?

3 A That's correct.

4 Q And was that the exact same status
5 change that happened to all of the other
6 similarly-situated reviewers on that project in
7 New York as of March 17, 2020?

8 A That's correct.

9 Q You had a couple of questions about
10 the Florida complaint in the action, and I have a
11 few questions of my own about that, if you would
12 just give me a moment.

13 Between the date that the Florida
14 complaint was lodged publicly on the docket in
15 Brevard County, Florida which was April --

16 MR. ROTMAN: Objection to the word
17 "lodged."

18 BY MR. ROSSI:

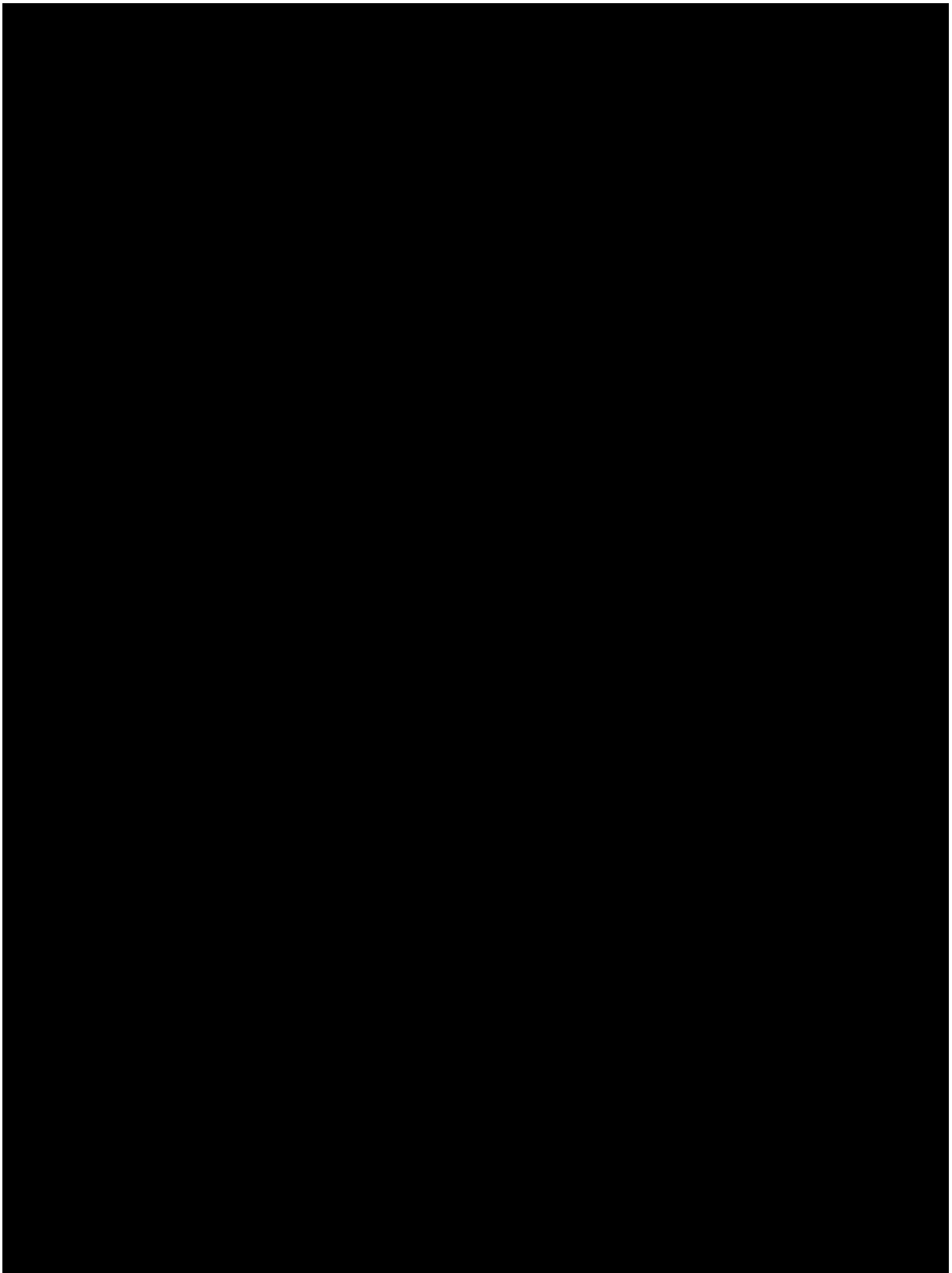
19 Q Which was April 15th, 2020, and the
20 date that the complaint was provisionally sealed,
21 which was April 20, 2020, so during that five-day
22 period, did you have occasion, sir, to review
23 that complaint while it was publicly available?

24 A I did.

25 Q I have a couple of general questions

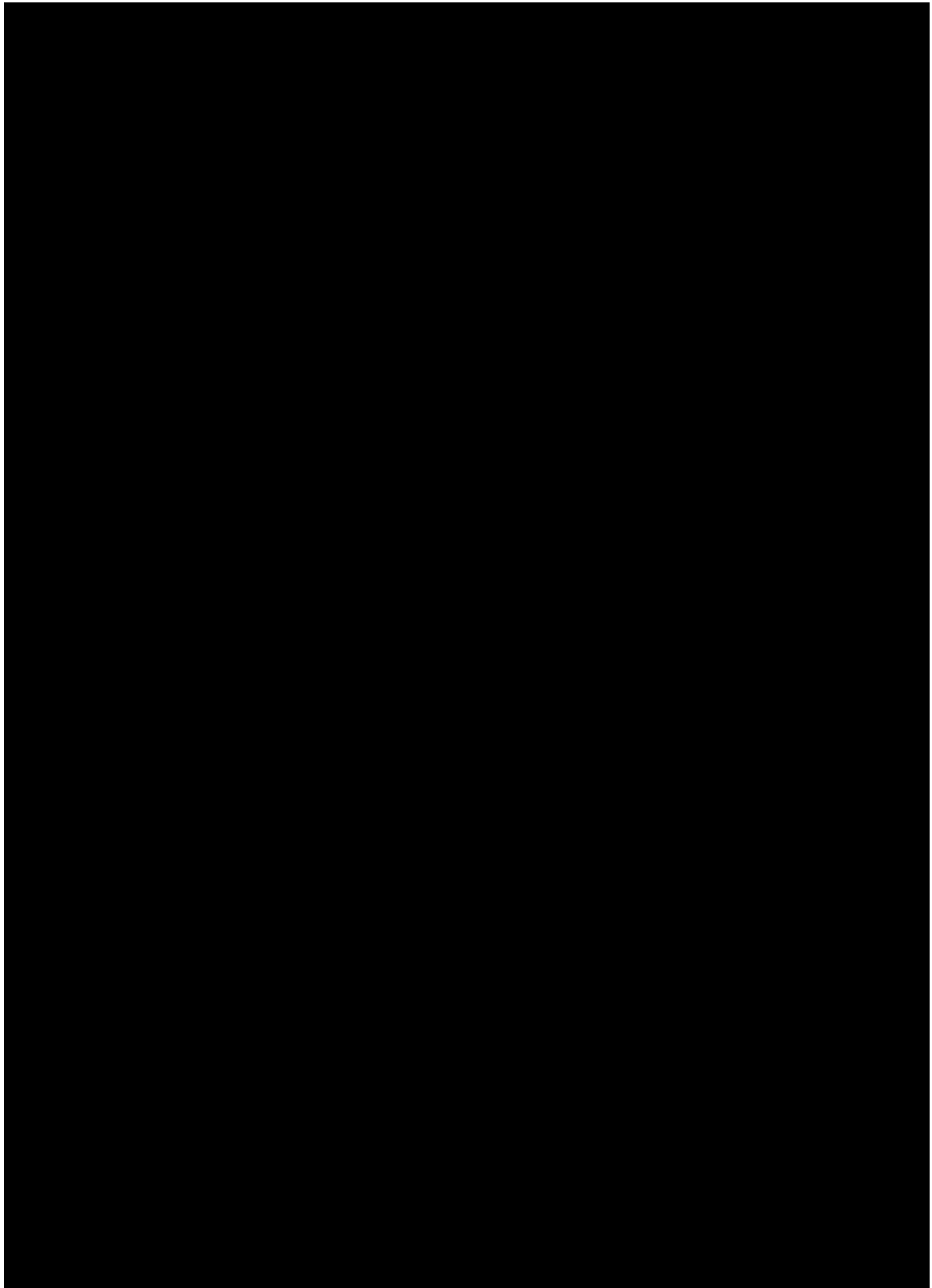
S. Zannikos, Esq.

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S. Zannikos, Esq.

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1 S. Zannikos, Esq.

2 BY MR. ROSSI:

3 Q Last question about the Florida
4 complaint.

5 In the Florida complaint, Mr. Delaney
6 alleges that he was fired by the corporate
7 client, not HC2; correct?

8 A That is correct.

9 MR. ROSSI: I'm checking my notes
10 to see if I have anything else.

11 THE WITNESS: Do you mind having a
12 quick call?

13 MR. ROSSI: Yeah, sure. We can go
14 off the record at this time.

15 MR. ROTMAN: Please put it on the
16 record that, you know, the witness asked for
17 a call and we're going off the record.

18 MR. ROSSI: Yeah. The witness
19 asked to confer with his counsel. We're
20 going to go off the record to confer. We'll
21 come back on the record. I may be finished.

22 (Whereupon there was a brief
23 recess from 11:46 a.m. until 11:52 a.m.)

24 MR. ROSSI: Just a couple more
25 questions, Mr. Rotman, before I finish my

1 S. Zannikos, Esq.

2 current examination.

3 BY MR. ROSSI:

4 Q Mr. Zannikos, during that period in
5 March that you were questioned about earlier in
6 or about early March through the closure of the
7 Lexington office on March 23rd, 2020, who, if
8 anyone at HC2, was responsible for coordinating
9 HC2 efforts with respect to dealing with the
10 COVID-19 virus in the workplace?

11 A That would be the vice president of
12 human resources, Patti Ayala.

13 Q And one other question, Mr. Zannikos.
14 Do you recall an email from Mr.
15 Hartstein to someone at Wilmer Hale that you were
16 questioned about earlier?

17 A I do.

18 Q What was Mr. Hartstein's position at
19 HC2 in or about March of 2020?

20 A Salesperson.

21 Q And he was resident in Los Angeles?

22 A Yes.

23 Q What, if any, role did Mr. Hartstein
24 have with respect to either Wilmer Hale's
25 decision to suspend the project or any subsequent

1 S. Zannikos, Esq.

2 actions that HC2 took?

3 A None. He's not in a position.

4 Q And -- I'm sorry. I didn't mean to
5 interrupt you.

6 A He's not in a position to influence
7 that determination.

8 Q To your understanding, did he
9 influence that determination in any way?

10 A He did not.

11 MR. ROSSI: I pass the witness at
12 this point in time, Mr. Rotman, subject to
13 any questions you might have.

14 MR. ROTMAN: Sure.

15 MR. ROSSI: Otherwise, I'm done.

16 FURTHER EXAMINATION

17 BY MR. ROTMAN:

18 Q I'm going to limit my examination to
19 the scope of what Mr. Rossi just asked you about,
20 Mr. Zannikos.

21 You just stated that Mr. Hartstein had
22 no authority to fire Mr. Delaney; isn't that
23 correct?

24 A That is correct. Well that's --
25 within what I said, you can assume that he does

1 S. Zannikos, Esq.

2 BY MR. ROTMAN:

3 Q He wouldn't be concerned -- would it
4 be fair that he would not be concerned about that
5 account?

6 A It would be fair to say that he has an
7 interest in the account.

8 Q Now I want to ask you, yourself,
9 personally, did there now come a point earlier
10 this year in 2020 when you went to remote work?

11 A Are you talking after -- you know, in
12 or around March time when the stay-at-home
13 order --

14 Q I don't want to conclude that it was
15 in March.

16 When did that happen? Did you go to
17 remote work -- did you ever go to -- more than
18 50 percent remote work at any point?

19 MR. ROSSI: Object to the form.

20 THE WITNESS: After the
21 stay-at-home orders were issued, some
22 clients elected to continue their projects
23 based on remote work, and some decided not
24 to.

25

1 S. Zannikos, Esq.

2 BY MR. ROTMAN:

3 Q I'm referring that question to you
4 specifically.

5 When did you start working remotely
6 full time? Not client work. I mean you.

7 A After the stay-at-home order was
8 issued in New York.

9 Q Did there come a point earlier this
10 year when you went to part-time working remotely?
11 And when I mean "part time," I don't mean, you
12 know, two hours a week. I mean where more than
13 half your time was working remotely; that's what
14 I'm getting at.

15 A I don't recall that, no.

16 Q So then it's fair to say that in this
17 whole period in early March, from let's say
18 March 1st to March 17th, you were still coming
19 into the office at 360 Lexington avenue?

20 A Predominantly, yes.

21 Q Five days a week?

22 A For the most part.

23 Q And what was your last day you worked
24 full time at 360 Lexington Avenue?

25 A I want to say I don't recall

1 S. Zannikos, Esq.

2 specifically. Maybe it was the Monday or Friday
3 before -- so maybe the 16th of March, which I
4 believe was a Monday.

5 Q Is there anything that would make your
6 recollection more accurate?

7 A I suppose there could be something; I
8 mean, if it's exists.

9 Q Is there an HC2 document that can
10 actually confirm the last date you were in the
11 office full time?

12 MR. ROSSI: Object to the form of
13 the question.

14 THE WITNESS: I don't know one
15 that exists. If you're saying that there's
16 something, then I suppose it might.

17 MR. ROTMAN: Okay. No further
18 questions.

19 MR. ROSSI: No further questions?

20 MR. ROTMAN: No.

21 MR. ROSSI: I don't have any
22 further questions of Mr. Zannikos at this
23 time either, so this closes the deposition
24 of Mr. Zannikos. I would like to thank
25 Ms. Friedman for her time and skill today.

1 S. Zannikos, Esq.

2 C E R T I F I C A T I O N

3 I, Randi Friedman, Registered
4 Professional Reporter and Notary Public of the
5 State of New York, do hereby certify:

6 THAT, the witness whose testimony is herein
7 before set forth, was duly sworn by me, and
8 THAT, the within transcript is a true record of
9 the testimony given by said witness.

10 I further certify that I am not related
11 either by blood or marriage to any of the parties
12 to this action; and that I am in no way
13 interested in the outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand this day, May 20, 2020.

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19 Randi Friedman, RPR
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